



**Linda S. Adams**  
Secretary for  
Environmental Protection

# Air Resources Board

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**Robert F. Sawyer, Ph.D., Chair**  
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Sacramento, California 95812 • [www.arb.ca.gov](http://www.arb.ca.gov)



**Arnold Schwarzenegger**  
Governor

August 11, 2006

Ms. Lisa Hanf, Chief  
Air Planning Office  
Air Division, Region 9  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105

Dear Ms. Hanf:

On February 24, 2006 the Air Resources Board (ARB) submitted the *2005 Carbon Monoxide Redesignation Request and Carbon Monoxide Maintenance Plan for the South Coast Air Basin* (Plan) to the U.S. Environmental Protection Agency (U.S. EPA) as a revision to California's State Implementation Plan (SIP) for Carbon Monoxide (CO). The Plan demonstrates that CO concentrations in the South Coast Air Basin have not exceeded the level of the National Ambient Air Quality Standard for CO since 2002, and that CO emissions will continue to decline as a result of an effective emission reduction strategy. In the letter, we asked that U.S. EPA make an expeditious finding that the Air Basin has attained the federal CO standards.

My staff started discussing SIP approvability issues with your staff before the Plan was adopted locally on March 4, 2005. We expected that the record of clean and improving CO air quality data, which is demonstrably attributable to an enforceable program that includes California's Enhanced Smog Check Program, would allow U.S. EPA to redesignate the South Coast Air Basin to attainment in a timely manner. U.S. EPA ultimately declined to act on the SIP submittal without a modeled demonstration that California's Enhanced Smog Check Program meets the "low enhanced" performance standards established in federal guidance for the Inspection and Maintenance (I/M) Program.

We have completed that modeled demonstration. It shows what we had asserted – that emission reductions from California's Enhanced Smog Check Program not only meet, but exceed the level of reductions required of a "low enhanced" I/M Program. ARB staff used EPA's MOBILE6.2 emissions model for this analysis, and appreciate the assistance provided by U.S. EPA staff for this emissions modeling exercise. The demonstration is enclosed.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.*

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California Environmental Protection Agency

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We request that you approve the previously submitted 2005 CO Plan as a revision to California's State Implementation Plan (SIP), and redesignate the South Coast Air Basin to "attainment" for CO, without further delay. Additionally, we request that U.S. EPA make an expeditious finding that the South Coast Air Basin has attained the federal CO standards, pending federal approval of this redesignation request.

If you have further questions, please contact me at (916) 445-5610, or Doug Thompson, Manager of the Motor Vehicle Assessments Section, at (916) 322-7062.

Sincerely,

/s/

Kurt Karperos, Chief  
Air Quality and Transportation Planning Branch

Enclosure

cc: Dr. Barry R. Wallerstein, D. Env.  
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Mr. Mark Pisano  
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Ms. Debbie Jordan, Director  
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